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*Counsel for Defendant Groupon, Inc.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LAS VEGAS SKYDIVING  
ADVENTURES, LLC, a Nevada limited-  
liability company;

Plaintiff,

v.

GROUPON, INC., a Delaware  
corporation; DOES I through X,  
inclusive; ROE CORPORATION I,

Defendants.

Case No.: 2:22-cv-00047-RFB-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
GROUPON, INC. TO FILE RESPONSE  
TO COMPLAINT**

**[FIRST REQUEST]**

Plaintiff Las Vegas Skydiving Adventure, LLC, and Defendant Groupon, Inc. (“Groupon”) by and through their respective counsel of record, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree to extend the deadline for Groupon’s response to the Complaint in this action (currently due on February 2, 2022) by three (3) weeks, through and including **February 23, 2022**, and request that the Court enter an order approving the same. This extension is requested so that Groupon, Inc. may fully investigate the Complaint, and due to schedule conflicts of counsel. This request is not for purposes of delay.

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Should Groupon's response to the Complaint include a motion under Fed. R. Civ. P. 12, the parties further stipulate and agree to extend the deadline for Plaintiff's response to such motion by three (3) weeks beyond the standard opposition deadline outlined in Local Rule 7-2.

**IT IS SO STIPULATED.**

DATED this 19th day of January, 2022.

DATED this 19<sup>th</sup> day of January, 2022.

**GIBSON LEXBURY LLP**

**GREENBERG TRAURIG, LLP**

/s/ Roman Nikhman

/s/ Tyler R. Andrews

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**ORDER**

IT IS ORDERED that ECF No. 5 is GRANTED in part and DENIED in part. It is granted to the extent that Groupon's deadline to respond to the complaint is extended. It is denied without prejudice to the extent the parties seek to extend Plaintiff's response deadline to a potential motion to dismiss, as this stipulation must be filed as a separate request. See LR IC 2-2(b).

IT IS SO ORDERED

DATED: 3:25 pm, January 20, 2022



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 19<sup>th</sup> day of January, 2022, a true and correct copy of the foregoing *Stipulation and [Proposed] Order to Extend Time for Groupon, Inc. to File Response to Complaint [First Request]* was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Andrea Lee Rosehill

An employee of GREENBERG TRAURIG, LLP